

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

THE NEW YORK TIMES COMPANY,

Plaintiff,

v.

OPENAI, INC., OPENAI LP, OPENAI GP, LLC,  
OPENAI, LLC, OPENAI OP CO LLC, OPENAI  
GLOBAL LLC, OAI CORPORATION, LLC,  
OPENAI HOLDINGS, LLC, and MICROSOFT  
CORPORATION,

Defendant.

Civil Action No. 1:23-cv-11195-SHS

**MOTION FOR ADMISSION OF  
ATTORNEY PRO HAC VICE**

Pursuant to Rule 1.3 of the Local Rules of the United States District Court for the Southern District of New York, I, Katherine M. Peaslee, hereby move this Court for an Order for admission to practice *Pro Hac Vice* to appear as counsel for Plaintiff The New York Times Company in the above-captioned action.

I am an active member in good standing of the State Bar of Washington and the State Bar of California. There are no pending disciplinary proceedings against me in any state or federal court. I have never been convicted of a felony. I have never been censured, suspended, disbarred or denied admission or readmission by any court. I have attached my declaration pursuant to Local Rule 1.3, as well as certificates of good standing from the Washington Supreme Court and the California Supreme Court.

Dated: March 1, 2024

/s/ Katherine M. Peaslee  
Katherine M. Peaslee (*pro hac vice pending*)  
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*Attorney for Plaintiff*  
*The New York Times Company*

**CERTIFICATE OF SERVICE**

I hereby certify this 1<sup>st</sup> day of March, 2024, I caused a true and correct copy of the foregoing to be electronically filed with the Clerk of the court using the CM/ECF system which will send notification to the attorneys of record and is available for viewing and downloading.

/s/ Katherine M. Peaslee  
Katherine M. Peaslee